

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Thomas A. Jacobson	:	
Joye L. Jacobson	:	Chapter 13
Debtor	:	
	:	Case No. 1:20-00436
Deutsch Bank National Trust Company, as Trustee,	:	
On behalf of the Holders of J.P. Morgan Mortgage	:	
Acquisition Trust 2007-CH3 Asset Backed Pass-	:	
Through Certificates, Series 2007-CH3	:	
	:	
Movant	:	
v.	:	Answer to Motion for Relief from Stay
	:	
Thomas A. Jacobson	:	
Joye L. Jacobson	:	
and	:	
Charles J. Dehart, III	:	
Trustee	:	

RESPONDENT'S REPLY TO MOTION FOR  
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 8<sup>th</sup> day of December, 2020, comes the respondents, Thomas A. Jacobson and Joye L. Jacobson, by and through counsel, the CGA Law Firm and E. Haley Rohrbaugh, Esquire, and does file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The exhibits speak for themselves.
5. Denied.
6. Admitted.

7. It is admitted that the Debtors have failed to make certain post-petition mortgage payments because of some financial difficulties.
8. Denied. The Debtors admits that they are currently obligated but is uncertain as to the exact amount of the loan post- petition amount. Debtors wish to discuss entering into a Stipulation to resolve any delinquency and seek a loan modification.
9. Denied. Debtor is without knowledge as to the principal balance due on the loan.
10. Denied. The averments of Paragraph 10 constitute conclusions of law to which no response of pleading is required.
11. Denied. Debtor is without knowledge as to whether, and to the extent which, Movant has incurred legal expenses.

WHEREFORE, it is requested that the relief sought not be granted.

Respectfully submitted,  
CGA Law Firm

/s/ E. Haley Rohrbaugh  
E. Haley Rohrbaugh, Esquire  
Sup. Ct. I.D. No. 323803  
Counsel for Debtor  
135 North George Street  
York, PA 17401  
(717) 848-4900

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Charles J. Dehart, III	:	
Respondents	:	
	:	
Trustee	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2020, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Charles J. DeHart, III, Esquire  
Chapter 13 Trustee  
ECF

James C. Warmbrodt, Esquire  
KML Law Group  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106

/s/ E. Haley Rohrbaugh  
E. Haley Rohrbaugh, Esquire